

Angela Brown on Behalf of
Shandra Brown

Plaintiff

v.

The Retirement Board of the
Police Men's Annuity and Benefit
Fund City of Chicago
Dr. Peter Orris MD

Defendant

COMPLAINT

United States District Court
Northern District of Illinois

RECEIVED

APR X 5 2013

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

Complaint is Attached to
this Form

13cv2595
Judge Feinerman
Mag. Judge Finnegan

I am in need of the court assistance in obtaining my daughter decease father pension for her.

Shandra father Decease Retirer Officer James C. Jackson pass away June 26, 2010.

Shandra and I were told by the Retirement Board that they gave Mr. Jackson's pension to his family. According to the Retirement Board handbook Shandra and Mr. Jackson youngest daughter are the only two entitled to their father pension. Shandra is Mr. Jackson adult daughter with several disabilities. The Retirement Board did not want to give Shandra 60% of her father pension and keep her on the insurance.

Shandra was remove from City records as if she was never Mr. Jackson daughter. The City of Chicago Finance Department shut down Shandra court order without notifying me, so that her support money would not come out of Mr. Jackson pension. My understanding is that the court is the only one who can stop a court order. At the time that this happen the person over City Comptroller's was Mr. Paul Volpe, the person over Garnishment Mr. Steve Lux and City Treasurer Ms. Stephanie Neely all three are Retirement Board members.

August 2012 The Retirement Board called Shandra & I to come back to their Officer. The Board gave us all the paper work for Shandra to received Mr. Jackson Pension. We were also told that we had to wait for their Doctor to make a decision.

In April 2011, ten months after Mr. Jackson death we had a hearing The Retirement Board remove all medical documents that Shandra Doctor presented, they also remove all the documents I presented to the Board to be heard at that hearing. The Retirement Board re-schedule the hearing so that I could submit the missing documents again.

June 2011, at the re-schedule hearing The Board doctor, Dr. Peter Orris made his decision in Shandra favor. The Retirement Board did not respect the testimony of their own Doctor, and The Board denied Shandra of her father pension.

In August 2011 I filed for a Administrative Review. We had a court date for March 8, 2012 with Honorable Judge Peter Flynn. The Retirement Board found Judge Flynn and had court without Shandra & I on September 26, 2011. We received a notice after the court date. We received a second notice three days later that it had been dismissed. The Retirement Board of the Policemen's Annuity and Benefit Fund of the City of Chicago have violated Shandra Brown civil right as a person with a disability.

Angela M. Brown
4/5/13

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Angela Brown on Behalf
of Shandra Brown

Plaintiff(s),

vs.

The Retirement Board of the
Police Men's Annuity and Benefit
Fund City of Chicago

Defendant(s).

Judge Feinerman

Case No. 13CV2595

COMPLAINT FOR VIOLATION OF CONSTITUTIONAL RIGHTS

This form complaint is designed to help you, as a pro se plaintiff, state your case in a clear manner. Please read the directions and the numbered paragraphs carefully. Some paragraphs may not apply to you. You may cross out paragraphs that do not apply to you. All references to "plaintiff" and "defendant" are stated in the singular but will apply to more than one plaintiff or defendant if that is the nature of the case.

1. This is a claim for violation of plaintiff's civil rights as protected by the Constitution and laws of the United States under 42 U.S.C. §§ 1983, 1985, and 1986.
2. The court has jurisdiction under 28 U.S.C. §§ 1343 and 1367.
3. Plaintiff's full name is Angela Marie Brown on Behalf of
Shandra Marie Brown

If there are additional plaintiffs, fill in the above information as to the first-named plaintiff and complete the information for each additional plaintiff on an extra sheet.

7. Defendant officer or official acted pursuant to a custom or policy of defendant municipality, county or township, which custom or policy is the following: *(Leave blank if no custom or policy is alleged)*: _____

8. Plaintiff was charged with one or more crimes, specifically:

9. *(Place an X in the box that applies. If none applies, you may describe the criminal proceedings under "Other")* The criminal proceedings

☐ are still pending.

☐ were terminated in favor of plaintiff in a manner indicating plaintiff was innocent.¹

☐ Plaintiff was found guilty of one or more charges because defendant deprived me of a fair trial as follows _____

☐ Other: _____

¹Examples of termination in favor of the plaintiff in a manner indicating plaintiff was innocent may include a judgment of not guilty, reversal of a conviction on direct appeal, expungement of the conviction, a voluntary dismissal (SOL) by the prosecutor, or a *nolle prosequi* order.

10. Plaintiff further alleges as follows: *(Describe what happened that you believe supports your claims. To the extent possible, be specific as to your own actions and the actions of each defendant.)*

Attached to another Complaint Form

11. Defendant acted knowingly, intentionally, willfully and maliciously.

12. As a result of defendant's conduct, plaintiff was injured as follows:

13. Plaintiff asks that the case be tried by a jury. ☒ Yes ☐ No

